

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

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UNITED STATES OF AMERICA,  
Plaintiff,

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Case No. 3:22-cr-184

-vs-

JESSICA MARIE TROTTIER, a/k/a  
JESSICA MARIE LATTEGRASS,  
Defendant.

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**MOTION FOR CONTINUANCE**

\* \* \* \* \*

COMES NOW the defendant, Jessica Marie Trottier, a/k/a Jessica Marie Lattergrass (hereinafter "Trottier"), by and through her attorney, Christopher D. Dohrer, who respectfully moves this Court for an order continuing the trial in this case, currently set to begin on Tuesday, July 22, 2025. The basis for this motion are as follows:

1. The undersigned counsel was appointed to represent Trottier on or about April 8, 2025. The undersigned is at least the third attorney appointed to represent Trottier in this case.
2. The undersigned counsel has been in contact with AUSA Alexander Stock. Mr. Stock advises, concerning discovery, that over 50,000 pages of written discovery exist. This does not include phone downloads, and the "hundreds (if not thousands)" of telephone calls and texts that will also be produced as part of discovery.
3. The undersigned counsel is also aware of this Court's order concerning the handling of discovery in this case. Specifically, the materials are to be encrypted on a hard drive provided by the North Dakota Federal Public Defender's Office, with instructions on how the undersigned is to handle storage of the discovery once received.
4. As of today, the USA Attorney's office and Federal Public Defender are compiling the discovery materials to send to the undersigned counsel's office. It is anticipated that the discovery will be received later this week, or early in the week of April 21.

5. As a result, upon receipt of the discovery, the undersigned will have approximately three (3) months to fully review the discovery, investigate the case, and prepare for trial. Given the voluminous nature of the discovery, and the numerous allegations brought against Trottier, the undersigned does not believe, in good faith, that this is a sufficient amount of time to prepare for trial.
6. This request is made in good faith, and not for reasons of delay, inconvenience to the Court or the parties, etc.
7. I have spoken with AUSA Alexander Stock, who advises that he does not object to this motion.

WHEREFORE, Defendant Trottier requests that the Court continue the trial of this matter by approximately ninety (90) days. Further, Defendant Trottier requests that all pre-trial deadlines be extended by the same length of time. It is the preference of the undersigned to try the case, if possible, before December 1, 2025.

Dated this 14th day of April, 2025.

DOHRER LAW OFFICE

By /s/ Christopher D. Dohrer  
Attorney for Defendant

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 14th day of April, 2025, a true and correct copy of the foregoing **Motion for Continuance** was served electronically by the clerk's office on:

Mr. Alexander J. Stock  
Assistant U.S. Attorney  
655 First Avenue North, Suite 250  
Fargo, ND 58102-4932

/s/ Christopher D. Dohrer